

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

IN RE REGIONS MORGAN KEEGAN  
SECURITIES, DERIVATIVE & ERISA  
LITIGATION

No. 09-md-02009-SHM

This Document Relates to:

*In re Regions Morgan Keegan Closed-End  
Fund Litigation,*

No. 07-cv-02830-SHM-dkv

**NOTICE OF MOTION OF PLAINTIFFS FOR FINAL APPROVAL  
OF PROPOSED SETTLEMENT AND PLAN OF ALLOCATION OF  
NET SETTLEMENT FUND AND FOR FINAL CLASS CERTIFICATION**

PLEASE TAKE NOTICE that Lead Plaintiffs Lion Fund, L.P., Dr. J. Samir Sulieman, and Larry Lattimore, on behalf of the Class, and C. Fred Daniels, in his capacity as Trustee *ad Litem* for the Leroy McAbee, Sr. Family Foundation Trust, on behalf of TAL Subclass, will move this Court on April 12, 2013, at 9:30 a.m. or as soon thereafter as counsel may be heard, at Courtroom 2 of the United States District Court for the Western District of Tennessee, Clifford Davis/Odell Horton Federal Building, 167 North Main Street, 11th Floor, Memphis, Tennessee 38013, before the Honorable Samuel H. Mays, Jr., for an Order, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, granting final approval to the proposed Settlement of this class action, approving the Plan of Allocation of the Net Settlement Fund, and granting final class certification for purposes of the Settlement.

This motion is premised on the accompanying supporting memorandum of law; the accompanying supporting Declaration of David J. Goldsmith in Support of Plaintiffs' Motion for

Final Approval of Proposed Settlement and Plan of Allocation of Net Settlement Fund and for Final Class Certification and Lead Counsel's Motion for an Award of Attorneys' Fees and Payment of Expenses, with annexed exhibits; the Court's January 4, 2013 Order Preliminarily Approving Settlement and Providing for Notice; the Stipulation and Agreement of Settlement dated as of October 12, 2012; and all prior papers and proceedings in this action.

A proposed Final Judgment and Order of Dismissal and a proposed Order Approving Plan of Allocation of Net Settlement Fund are submitted herewith. A Certificate of Consultation made pursuant to Local Rule 7.2(a)(1)(B) is also submitted herewith.

Dated: March 8, 2013

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 8, 2013, I electronically filed the foregoing documents with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following participating CM/ECF participants:

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*/s/ David J. Goldsmith*

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